

### REMARKS

Claims 61-64 and 66-70 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,502,112 (“Baisley”) in view of U.S. Patent No. 6,098,071 (“Aoyama”) and further in view of U.S. Patent No. 6,366,933 (“Ball”).

Claim 61 has been amended to more fully distinguish over the prior art of record. Specifically, Claim 61 has been amended to recite executable instructions to “apply a rules-based, multi-scan markup code reduction normalizer to the first and second documents to create a normalized first document and a normalized second document...” Furthermore, Claim 61 has been amended to clarify the type of rules used in the rules-based, multi-scan markup code reduction normalizer. In particular, the claim now recites: “wherein the markup code reduction normalizer scans for and removes any markup code head element, reference to scripts, intradocument link, and relative URL.” Dependent claims 66 and 68 have been amended for consistency. Support for the amendments is found throughout the specification, and in particular, at page 9, lines 10-19 and in Figure 2. No new matter has been added.

Applicant respectfully submits that the combination of Baisley, Aoyama, and Ball does not show, suggest or render predictable the subject matter of amended claim 61. In particular, the proposed combination does not disclose applying a rules-based, multi-scan markup code reduction normalizer to first and second documents so as to remove any markup code head element, reference scripts, intradocument link and relative URL.

The Examiner indicates that Baisley and Aoyama teach the creation of normalized documents. In Baisley, the Examiner refers to the creation of semantic graphs of interrelated objects as the creation of normalized documents. Office Action page 3 citing Baisley column 5, lines 30-67, column 6, lines 1-65, and column 7, lines 30-35. This assertion needs to be reconsidered for two reasons. First, the “normalized document” must be specifically produced through “a markup code reduction normalizer.” Hence, assigning objects in a semantic graph does not anticipate the claimed limitation of a “normalized document” because it does not create the objects through a markup code reduction normalizer. Second, the assignment of objects in a semantic graph does not maintain the visual format of the documents. For example, the semantic graphs in Baisley do not contain separate lines corresponding to the block elements in each

document. In Figures 3A-3D of Baisley, the semantic graphs do not present the same visual format of the original markup documents. In addition, the semantic graphs do not contain lines in the markup language.

The Examiner addresses the deficiencies of Baisley with teachings in Aoyama. Aoyama, however, does not cure Baisley's deficiencies. The Examiner compares Aoyama's element allocation to each node of the document tree as a form of a "rules-based multi-scan normalization." Office Action page 3, citing Aoyama, column 7, lines 18-45. However, in light of the present amendment, the rules for allocating document tree nodes are different than the claimed rules of removing specific elements from the first and second documents. Furthermore, claim 61's normalized documents must maintain the visual formatting of each document coded in the markup language, and have separate lines corresponding to the block elements in each document. Aoyama's document tree does not maintain the visual formatting of the original documents, and the document tree does not maintain the normalized documents in the markup language.

It should be appreciated that unlike Aoyama and Baisley, the claimed normalization prior to the line-by-line comparison does not involve reconstruction of data, such as the tree nodes in Aoyama or the semantic graph in Baisley. *See* Aoyama, column 4, lines 35-38, Fig. 2A (first comparing tree nodes, then comparing characters within the nodes), Fig. 20; Baisley, Fig. 3A-3D, Fig. 5 (first comparing object type and number of property, then compare each property of each object within the first document with the second document using the semantic graph). The present invention reduces the markup code in a document into a normalized document without changing the data structure, and without changing the visual display of the document (removal of markup code head element, reference to scripts, intradocument link and relative URL does not disturb the visual display of the document). In contrast, column 13, lines 57-67 of Aoyama teaches that the extraction and storage of structural information is necessary. Furthermore, here the comparison of the document is done on a line-by-line basis without the need for structural differentiation between tags and tag contents or object types and object properties. The present invention uses the rule based, multi-scan markup code reduction normalizer to prepare for a line-by-line comparison of the raw markup language.

Hence, the extent of Ball's teaching of line-by-line comparison is not relevant without the teaching of the rule-based, multi-scan creation of normalized documents through a markup code reduction normalizer. Claim 61 requires a line-by-line comparison between the *normalized* first and second documents coded in the markup language. Since neither Baisley nor Aoyama nor Ball teaches creating these normalized documents, the teachings of all three patents fail to anticipate or render obvious amended claim 61. Thus, claim 61 should be in a condition for allowance. Claims 62-70 are dependent upon claim 61 and therefore should also be in a condition for allowance.

Accordingly, in view of the foregoing amendments and remarks, it is respectfully submitted that the application is now in condition for allowance. The Examiner is invited to contact the undersigned if there are any residual issues that can be resolved through a telephone call.

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